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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON**

AARON J. SHEPARD and NICOLE H.
SHEPARD, individually, and on behalf of
the marital community,

Plaintiffs,

vs.

CHELAN COUNTY, by and through its
Agency the CHELAN COUNTY
SHERIFF'S OFFICE, a Washington
Municipal Corporation,

Defendants.

NO. 2:23-CV-00041-TOR

**STIPULATION AND
PROPOSED ORDER
GRANTING DEFENDANTS'
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

January 29, 2025
Without Oral Argument

COME NOW the parties, by and through their undersigned counsel of
record and submit the following stipulation and proposed order. The parties
hereby stipulate as follows:

On December 6, 2024, defendants filed their Motion for Partial Summary
Judgment (ECF No. 21) seeking dismissal of all claims against the Chelan County

**STIPULATION AND ORDER GRANTING
DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT - 1**

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Sheriff's Office and dismissal of plaintiffs' § 1983 and state law claims against defendant Chelan County.

Defendants allege, and plaintiffs concede, that no material dispute of fact exists and that pursuant to Fed. R. Civ. P. 56 all claims made against Chelan County Sheriff's Office should be dismissed. Defendants further allege, and plaintiffs also concede that all claims made against Chelan County pursuant to 42 U.S.C. § 1983 and under Washington state law should also be dismissed.

The causes of action to be dismissed are limited to the following:

1. The *FIRST CAUSE OF ACTION: §1983 CLAIM FOR VIOLATING OF THE ESTABLISHMENT CLAUSE OF THE FIRST AMENDMENT*
2. The *SIXTH CAUSE OF ACTION: EMPLOYMENT DISCRIMINATION (HOSTILE WORK ENVIRONMENT) BASED ON RELIGION IN VIOLATION OF THE WASHINGTON LAW AGAINST DISCRIMINATION (WLAD), RCW 49.60.180.*
3. The *SEVENTH CAUSE OF ACTION: EMPLOYMENT DISCRIMINATION (HARASSMENT) BASED ON RELIGION IN VIOLATION OF THE WASHINGTON LAW AGAINST DISCRIMINATION (WLAD), RCW 49.60.180.*
4. The *EIGHTH CAUSE OF ACTION: EMPLOYMENT DISCRIMINATION BASED ON RELIGION IN VIOLATION OF THE WASHINGTON LAW AGAINST DISCRIMINATION (WLAD), RCW 49.60.180.*
5. The *NINTH CAUSE OF ACTION: RETALIATION IN VIOLATION OF THE WASHINGTON LAW AGAINST DISCRIMINATION, (WLAD), RCW 49.60.210.*
6. The *TENTH CAUSE OF ACTION: TORT OF NEGLIGENCE INFLICTION OF EMOTIONAL DISTRESS IN VIOLATION OF THE WASHINGTON COMMON LAW.*
7. The *ELEVENTH CAUSE OF ACTION: TORT OF INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS IN VIOLATION OF THE WASHINGTON COMMON LAW.*
8. The *TWELFTH CAUSE OF ACTION: TORT OF WRONGFUL DISCHARGE IN VIOLATION OF WASHINGTON STATE LAW.*

9. The *THIRTEENTH CAUSE OF ACTION WASHINGTON STATE TORT OF OUTRAGE*.

Dated this 23rd day of December, 2024.

s/KIRK A. EHLIS (WSBA #22908)

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ORDER

Based upon the foregoing Stipulation,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED, that defendants' Fed. R. Civ. P. 56 motion for partial summary judgment (ECF No. 21) should be and hereby is **GRANTED**, and the hearing set for January 29, 2025 is stricken.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that all claims and causes of action alleged by the plaintiffs against defendant CHELAN COUNTY SHERIFF'S OFFICE are hereby **DISMISSED WITH PREJUDICE**.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that all claims and causes of action alleged by the plaintiffs under and/or based upon 42 U.S.C. § 1983 are hereby **DISMISSED WITH PREJUDICE**.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that all claims and causes of action alleged by the plaintiffs under and/or based upon Washington state law are hereby **DISMISSED WITH PREJUDICE**.

DONE IN OPEN COURT THIS ____ day of _____, 2025.

THOMAS O. RICE
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2024, I electronically served the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

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and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

None

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